



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

**The Dingley Press, LLC  
Androscoggin County  
Lisbon, Maine  
A-506-77-3-M**

**Departmental  
Findings of Fact and Order  
New Source Review  
NSR #3**

**FINDINGS OF FACT**

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), Section 344 and Section 590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	The Dingley Press, LLC
LICENSE TYPE	06-096 CMR 115, Minor Revision
NAICS CODES	323110
NATURE OF BUSINESS	Commercial Lithographic Printing
FACILITY LOCATION	119 Lisbon St, Lisbon, Maine

**B. Revision Description**

The Dingley Press, LLC (Dingley) operates four lithographic printing presses that are controlled by two regenerative thermal oxidizers (RTOs). Dingley's current New Source Review (NSR) license contains conditions pertaining to the minimum volatile organic compound (VOC) destruction efficiency of the RTOs as well as the minimum temperature that must be maintained to demonstrate compliance with that destruction efficiency. Dingley has requested an amendment to their NSR license to make clarifications to these conditions.

Dingley's current license states that RTO #1 and RTO #2 shall each achieve a VOC destruction efficiency of 97.5% for an inlet concentration of 1000 ppmv or higher as propane. If the inlet concentration is less than 1000 ppmv as propane, Dingley must meet an outlet concentration of 25 ppmv as propane. Dingley would like to clarify that compliance with requirements to control VOC emissions may be demonstrated by meeting a destruction efficiency of 97.5% or an output stack concentration of 25 ppmv as propane, independent of the stack inlet concentration. Since an outlet concentration of 25 ppmv would represent greater

than 97.5% destruction efficiency for inlet concentrations over 1000 ppmv, these requirements are considered to be equivalent.

Additionally, Dingley's current license states that RTO #1 and RTO #2 shall each maintain a temperature of 1300°F or the temperature which successful stack testing demonstrates a destruction efficiency of at least 97.5%. Dingley has requested the phrase about successful stack testing demonstration be removed. The original intent was to give Dingley the flexibility to demonstrate compliance at a lower temperature. However, it is unlikely that this flexibility would ever be utilized and it has caused confusion in interpreting its meaning.

C. Application Classification

The application submitted by Dingley does not violate any applicable federal or state requirements, does not reduce monitoring, reporting, testing or record keeping, and does not seek to modify a Best Available Control Technology (BACT) analysis.

The proposed revision will not change the facility's emission limits. Therefore, the amendment is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (CMR) 115 (as amended). The procedures found in 06-096 CMR 115 (as amended) can be utilized to process this application since the proposed revision is not prohibited by the Part 70 air emission license. This minor revision shall be incorporated into the Part 70 air emission license renewal currently in process.

**ORDER**

The Department hereby grants Air Emission License Minor Revision A-506-77-3-M pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

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3

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### SPECIFIC CONDITIONS

The following shall replace Condition (1)(C) of Air Emission License A-506-77-1-M and Condition (15)(J) of Air Emission License A-506-77-2-M:

- (1) RTO #1 and RTO #2 shall each meet a minimum destruction efficiency of 97.5% removal of VOC or an output stack concentration of less than 25 ppmv as propane. Compliance shall be demonstrated by stack testing on or before September 26, 2019 and once every five years thereafter. [06-096 CMR 115, BACT]

The following shall replace Condition (24)(K) of Air Emission License A-506-70-F-A:

- (2) RTO #1 and RTO #2 shall each maintain a temperature of at least 1300°F. The RTO control systems shall be equipped with interlocks which shut down the presses if the temperature drops below 1300°F. [06-096 CMR 140, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS 29<sup>th</sup> DAY OF October, 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Maure Allen Robert Cora for  
PATRICIA W. AHO, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/16/14

Date of application acceptance: 10/16/14

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

